

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MARGARET BROCK, ET AL

Plaintiff(s)

VS.

DANETTE THOMAS, ET AL

Defendant(s)

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:
:
:
:
:

CIVIL ACTION

No. 10-cv-687

WILLIAM NOLDE

Plaintiff(s)

VS.

SILVER BUCKMAN, ET AL

Defendant(s)

:
:
:
:
:
:

CIVIL ACTION

No. 10-cv-3128

EDWARD A. HARPER,

Plaintiff(s)

VS.

SILVER BUCKMAN, ET AL

Defendant(s)

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:
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:
:

CIVIL ACTION

No.10-cv-05624

**ANSWER OF DEFENDANT, RESIDENTIAL CREDIT SOLUTIONS, INC.
TO THE FIRST AMENDED COMPLAINT OF PLAINTIFF, WILLIAM NOLDE**

The Defendant, Residential Credit Solutions, Inc., under *Nolde vs. Silver Buckman, et al*, No. 10-3128 (“Answering Defendant”), by and through its counsel, Schubert, Bellwoar, Cahill & Quinn, answers Plaintiff, William Nolde's First Amended Complaint as follows:

1. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the

allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

2. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

3. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

II. ANSWER TO JURISDICTION AND VENUE

4. The allegations of this paragraph contain conclusions of law to which no answer is required.

5. The allegations of this paragraph contain conclusions of law to which no answer is required.

6. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

7. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

8. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

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10. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

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13. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

14. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

15. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial.

16. Admitted.

IV. ANSWER TO STATEMENT OF FACTS

A. Answer to the Alleged Criminal Conspiracy Generally

17. The allegations of this paragraph are directed to parties other than answering Defendant. Therefore, no answer is required. To the extent the allegations of this paragraph contain legal conclusions, no answer is required.

18. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

19. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

20. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

21. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

22. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

23. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

24. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

25. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

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27. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

28. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

B. Answer to Facts Pertaining to the Plaintiff

29. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is admitted that at some point William Nolde purchased 6016 Keystone Street, Philadelphia, Pennsylvania.

30. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

31. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the

allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

32. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

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34. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

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are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

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58. a. g. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak

for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

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is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

62. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

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64. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the

allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

65. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

66. It is admitted that the loan went into default. As to the remaining allegations, after reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

67. The allegations of this paragraph refer to writings which speak for themselves. It is admitted that Defendant, BAC foreclosed on the home. Upon information and belief, it is admitted that BAC had a Sheriff Sale scheduled for July, 2010 which was postponed until September, 2010.

68. Admitted in part; denied in part. It is admitted that the assignment of the mortgage was assigned to answering Defendant. The balance of the averment is denied. Answering Defendant is now the plaintiff of record according to the State foreclosure docket.

69. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

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allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

V. ANSWER TO CAUSES OF ACTION

ANSWER TO COUNT I: Violation of 18 U.S.C. §1962(c)

William Nolde vs. Silver Buckman, et al

72. Answering Defendant incorporates by reference its Answer contained in Paragraphs 1 through 71 as if set forth herein at length.

73. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

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79. a. - 1. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer

is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

80. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

81. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

82. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations

are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

83. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

84. a. - e. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

85. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

86. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

87. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. It is specifically denied that answering Defendant was a member of or participated

in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

88. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

89. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

ANSWER TO COUNT II: Violation of 18 U.S.C. §1962(d)

William Nolde vs. Silver Buckman, et al

90. Answering Defendant incorporates by reference its Answer contained in Paragraphs 1 through 89 as if set forth herein at length.

91. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the

allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

92. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

93. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

94. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is

demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

95. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

96. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial. It is specifically denied that answering Defendant was a member of or participated in any Enterprise to defraud any individual or committed any alleged crime. Strict proof to the contrary is demanded at the time of trial.

97. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

ANSWER TO COUNT III: Fraud

William Nolde vs. Silver Buckman, et al

98. Answering Defendant incorporates by reference its Answer contained in Paragraphs 1 through 97 as if set forth herein at length.

99. a. - g. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph refer to writings, said writings speak for themselves and all characterizations are specifically denied. Strict proof to the contrary is demanded at the time of trial.

100. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer

is required. To the extent the allegations of this paragraph are directed to answering Defendant, RCS, denied. Strict proof is demanded at the time of trial. By way of further answer, answering Defendant, RCS incorporates by reference its Motions to Dismiss which were filed with the Court on September 30, 2010.

101. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph are directed to answering Defendant, RCS, denied. Strict proof is demanded at the time of trial. By way of further answer, answering Defendant incorporates by reference its Motions to Dismiss which were filed with the Court on September 30, 2010.

102. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. To the extent the allegations of this paragraph are directed to answering Defendant, RCS, denied. Strict proof is demanded at the time of trial. By way of further answer, answering Defendant incorporates by reference its Motions to Dismiss which were filed with the Court on September 30, 2010.

103. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

104. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

105. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

106. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the

allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

107. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

ANSWER TO COUNT IV:

Unfair Trade Practices and Consumer Protection Law

William Nolde vs. Silver Buckman, et al

108. Answering Defendant incorporates by reference its Answer contained in Paragraphs 1 through 107 as if set forth herein at length.

109. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

110. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the

allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

111. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required. By way of further answer, Mr. Nolde no longer holds title to 6016 Keystone Street, Philadelphia, Pennsylvania, by way of the Bankruptcy Court Order on his own motion to approve the sale of the property to the Foxworths.

112. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.

113. After reasonable investigation, answering Defendant is without sufficient knowledge to form a belief as to the truth of the allegations of this paragraph, which allegations are specifically denied. Strict proof if relevant is demanded at the time of trial. To the extent the allegations of this paragraph contain legal conclusions, no answer is required. To the extent the allegations of this paragraph are directed to parties other than Answering Defendant, no answer is required.